

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DIANE OWENS,

Plaintiff,

v.

FIRSTENERGY CORP., *et al.*,

Defendants.

Case No. 2:20-cv-03785-ALM-KAJ

Chief Judge Algenon L. Marbley

Magistrate Judge Kimberly A. Jolson

CHANA FRAND,

Plaintiff,

v.

FIRSTENERGY CORP., *et al.*,

Defendants.

Case No. 2:20-cv-04287-ALM-KAJ

Chief Judge Algenon L. Marbley

Magistrate Judge Kimberly A. Jolson

**JOINT MOTION AND STIPULATION
REGARDING INITIAL CASE SCHEDULE**

WHEREAS, on November 23, 2020, the Court entered an order consolidating the above-captioned *Owens* and *Frاند* actions and appointing LACERA as lead plaintiff and Robbins Geller Rudman & Dowd LLP as lead counsel;

WHEREAS, the Parties have been conferring regarding initial case-related matters, including scheduling; and

WHEREFORE, the Parties, through their undersigned counsel, hereby agree, stipulate, and respectfully request that the Court enter an Order as follows:

1. Lead Plaintiff shall file a consolidated complaint (the “Complaint”) no later than 60 days from the entry of this Order;

2. No later than 60 days after the filing of the Complaint, Defendants shall answer, move to dismiss, or otherwise respond to the Complaint;
3. If Defendants file a motion to dismiss the Complaint, Lead Plaintiff shall file their response no later than 45 days after the filing of the motion to dismiss;
4. Defendants shall file their reply in support of any motion to dismiss no later than 30 days after the filing of Lead Plaintiff's opposition.
5. If the last day of any period set forth above is a Saturday, Sunday, or legal holiday, then the period shall extend until the end of the next day that is not a Saturday, Sunday, or legal holiday.
6. No later than 7 days before the deadline for filing any motion to dismiss, answer, or other response, the parties will file a stipulation regarding page limitations.
7. The parties will submit all future filings in these consolidated cases under the caption *In re FirstEnergy Corp. Securities Litigation*, No. 2:20-cv-03785.

IT IS SO STIPULATED.

The parties have submitted a proposed order for the Court's consideration.

Dated: December 10, 2020

Respectfully submitted,

s/ Joseph F. Murray (with permission)
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Respectfully submitted,

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Attorneys for Defendant Charles E. Jones

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will notify all counsel of record.

s/ Geoffrey J. Ritts

Geoffrey J. Ritts, Trial Attorney (0062603)

*One of the Attorneys for Defendants
FirstEnergy Corp., James F. Pearson,
Steven E. Strah, and K. Jon Taylor*